

1 STEPHEN M. TILLERY (*pro hac vice*)
stillery@koreintillery.com
2 GARRETT R. BROSHUIS (*pro hac vice*)
gbroshuis@koreintillery.com
3 GIUSEPPE S. GIARDINA (*pro hac vice*)
ggiardina@koreintillery.com
4 **KOREIN TILLERY, LLC**
505 North 7th Street, Suite 3600
5 St. Louis, MO 63101
Telephone: (314) 241-4844
6 Facsimile: (314) 241-3525

7 GEORGE A. ZELCS (*pro hac vice*)
gzels@koreintillery.com
8 **KOREIN TILLERY, LLC**
205 North Michigan, Suite 1950
9 Chicago, IL 60601
Telephone: (312) 641-9750

10 BRUCE L. SIMON (Bar No. 96241)
bsimon@pswlaw.com
11 **PEARSON, SIMON & WARSHAW, LLP**
12 44 Montgomery Street, Suite 2450
San Francisco, CA 94104
13 Telephone: (415) 433-9000
14 Facsimile: (415) 433-9008

DANIEL L. WARSHAW (Bar No. 185365)
dwarshaw@pswlaw.com
BOBBY POUYA (Bar No. 245527)
bpouya@pswlaw.com
PEARSON, SIMON & WARSHAW, LLP
15165 Ventura Boulevard, Suite 400
Sherman Oaks, CA 91403
Telephone: (818) 788-8300
Facsimile: (818) 788-8104

15 Attorneys for all Plaintiffs, individually and on
16 behalf of all those similarly situated

17 **UNITED STATES DISTRICT COURT**

18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

19 AARON SENNE, et al., Individually and on
20 Behalf of All Those Similarly Situated,

21 Plaintiffs,

22 vs.

23 OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
24 doing business as MAJOR LEAGUE
BASEBALL, et al.,

25 Defendants.

CASE NO. 3:14-cv-00608-RS

CLASS ACTION

**DECLARATION OF BOBBY POUYA IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO FILE
CERTAIN DOCUMENTS UNDER SEAL
IN SUPPORT OF THEIR MOTION TO
COMPEL (L.R. 7-11, 79-5)**

1 Bobby Pouya declares:

2 1. I am an attorney duly admitted to practice before this Court. I am an associate with
3 the firm of Pearson, Simon & Warshaw, LLP, attorneys of record for Plaintiffs.

4 2. I am personally familiar with the facts set forth in this declaration. If called as a
5 witness I could and would competently testify to the matters stated herein.

6 3. I submit this declaration in support of Plaintiffs' administrative motion to file under
7 seal redacted portions of Defendant Tampa Bay Rays Baseball, Ltd's ("Tampa Bay Rays")
8 Objections and Answers to Plaintiffs' First Set of Interrogatories to Personal Jurisdictional
9 Defendants Regarding Personal Jurisdiction and Venue ("PJ Interrogatory Responses").

10 4. The PJ Interrogatory Responses are being filed in support of Plaintiffs'
11 concurrently filed Motion to Compel Venue and Jurisdictional Discovery.

12 5. The PJ Interrogatory Responses have been redacted and filed under seal because
13 Defendant Tampa Bay Rays Baseball, Ltd. have designated certain information therein as
14 Confidential.

15 6. Although, a protective order has not been entered in this case the parties reached an
16 agreement that the Defendants could designate their discovery responses as "Confidential" and
17 would be treated as such by Plaintiffs.

18 7. On September 3, 2014, I met and conferred with Counsel for the Tampa Bay Rays
19 regarding the scope of the confidential designations in the PJ Interrogatory Responses. Pursuant
20 to these meet and confer efforts, counsel for the Tampa Bay Rays advised me that Plaintiffs could
21 publicly file PJ Interrogatory Responses while redacting the following information: (1) the city of
22 residence for certain Tampa Bay Rays employees; and (2) financial information regarding certain
23 taxes paid by the Tampa Bay Rays. These redactions were applied to the PJ Interrogatory
24 Responses and approved by counsel for the Tampa Bay Rays.

25 8. Attached to this declaration as Exhibit "A" is a redacted version of the PJ
26 Interrogatory Responses, which was filed in support of Plaintiffs' Motion to Compel Venue and
27 Jurisdictional Discovery.

